## R O N A L D L . R O S E M A N A T T O R N E Y - A T - L A W

2011 - 14TH AVENUE EAST • SEATTLE, WA • 98112

PHONE: 206.324.8792 • FAX: 206.568.0138 • EMAIL: ronaldroseman@comcast.net

December 18, 2006

### Via email and overnight delivery

C. Robert Wallis ALJ WUTC 1300 S. Evergreen Park. DR S.W. PO Box 47250 Olympia, WA.98504

Dear Judge Wallis:

The Energy Project will use Cross Exhibits which are Avista's answers to the Energy Project's Data Request No. 2, 4 with Mr. Hirschkorn and Avista's answer to The Energy Project's data request No. 3 with Mr. Powell. I have enclosed original and 8 copies of such request.

'~ all

incerely,

Ronald L. Roseman

# AVISTA CORP. RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:

Washington

DATE PREPARED: 11/3/06

CASE NO:

UG-060518

WITNESS: Brian Hirschkorn

REQUESTER:

Energy Project

RESPONDER:

Brian Hirschkorn

TYPE:

Data Request

DEPT:

Rates

**REQUEST NO.:** 

EP-2

TELEPHONE:

(509) 495-4723

REQUEST: What is the total annual budget for Avista's conservation programs?

- a. How much of this budget is collected on bills from residential customers?
- b. How much of this budget is collected on bills from commercial customers?
- c. How much of this budget is collected on bills from industrial customers?

### **RESPONSE:**

Avista's 2007 gas DSM budget is approximately \$3 million for Washington and Idaho – using the WA/ID allocation percentage of 75%/25%, \$2.25 million would be attributable to Washington. The new DSM (Schedule 191) rates effective 11/1/06 are designed to fund the 2007 budget and recover the present negative balance (expenditures exceed collections) over the next two years. The estimated annual collections by class to fund the 2007 budget are as follows:

- a. Residential \$1,367,000
- b. Commercial \$814,000
- c. Industrial \$87,000

# AVISTA CORP. RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:

Washington

DATE PREPARED: 11/01/2006

CASE NO:

UE-060518

WITNESS:

n/a

REQUESTER:

**Energy Project** 

RESPONDER:

Jon Powell

TYPE:

Data Request

DEPT:

**Energy Solutions** 

**REQUEST NO.:** 

EP-03

TELEPHONE:

(509) 495-4047

#### **REQUEST:**

EP-3

How much of the conservation budget is spent on:

a. residential conservation measures?

b. commercial conservation measures?

c. industrial conservation measures?

#### **RESPONSE:**

Avista's 2007 budget for natural gas DSM does not delineate between non-residential customer segments. Additionally there are several budget components that contribute to the effort within multiple customer segments.

The following breakout of the Washington and Idaho 2007 natural gas budget into the following categorizations is a more useful response to the question:

Industrial	\$0
Mixed commercial / industrial	\$1,411,209
Commercial	\$215,600
Agricultural	\$243,000
Residential	\$764,396
Joint among all segments	\$358,170
Total	\$2,992,275

# AVISTA CORP. RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:

Washington

DATE PREPARED: 11/3/06

CASE NO: REQUESTER: UG-060518 Energy Project WITNESS: Brian Hirschkorn

RESPONDER: Brian Hirschkorn

TYPE:

Data Request

DEPT:

Rates

REQUEST NO.:

EP-4

TELEPHONE:

(509) 495-4723

### **REQUEST:**

If the proposed decoupling mechanism were to indicate the utility deserved to recover a shortfall of \$1,000,000

- a. How much would be collected on residential customers' bills?
- b. How much from commercial customers?
- c. How much from industrial customers?

#### RESPONSE:

Based on the proportionate 2005 annual therm sales by class under Schedule 101:

- a. Residential \$846,000
- b. Commercial \$152,000
- c. Industrial \$2,000